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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER
IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT
REGARDING FIRST AMENDED
CONSOLIDATED ADVERTISER CLASS
ACTION COMPLAINT (Dkt. 237)**

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this
4 declaration in support of Meta's Motion for Summary Judgment Regarding First Amended
5 Consolidated Advertiser Class Action Complaint (Dkt. 237).

6 2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the Expert
7 Merits Report of Michael Williams, dated January 12, 2024.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript
9 from Michael Williams' class certification deposition held on September 26, 2023.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the transcript
11 from Michael Williams' merits deposition held on February 23, 2024.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the transcript
13 from Kevin Kreitzman's merits deposition held on March 6, 2024.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the transcript
15 from Kevin Kreitzman's class certification deposition held on October 2, 2023.

16 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript
17 from Tilman Klumpp's merits deposition held on March 5, 2024.

18 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the Expert
19 Merits Report of Tilman Klumpp, dated January 12, 2024.

20 9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the Expert
21 Merits Report of Kevin Kreitzman, dated January 12, 2024.

22 10. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the Expert
23 Merits Report of Markus Jakobsson, dated January 12, 2024.

24 11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the
25 transcript from Markus Jakobsson's merits deposition held on February 22, 2024.

26 12. Attached hereto as Exhibit 11 is a true and correct copy of an excerpt from
27 Advertiser Plaintiffs' Responses and Objections to Defendant Meta Platform, Inc.'s Fifth Set of
28 Interrogatories to Advertiser Plaintiffs, dated June 20, 2023.

1 13. Attached hereto as Exhibit 12 is a true and correct copy of excerpts of the Expert
2 Merits Rebuttal Report of Tilman Klumpp, dated February 9, 2024.

3
4 I declare that the foregoing is true and correct under penalty of perjury.

5 Executed on this 5th day of April, 2024, in New York, New York.

6 By: /s/ David Z. Gringer

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SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta
Sonal N. Mehta